

FILED  
JUL 10 2019  
U.S. DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA,

v.

BIJAN RAFIEKIAN, et al.,

Defendants.

No. 1:18-CR-457-AJT

**NON-PARTY MATTHEW M. NOLAN, ESQ.'S EMERGENCY  
MOTION TO QUASH TRIAL SUBPOENA**

Non-Party Matthew M. Nolan, Esq., a partner at Arent Fox LLP, hereby moves the Court for an order quashing the trial subpoena issued to him by counsel for Bijan Rafiekian, on the grounds that the testimony sought is protected by the attorney-client privilege and work product doctrine. A memorandum of law in support of this motion is filed herewith.

Respectfully submitted this 9<sup>th</sup> day of July, 2019.

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 9, 2019, the foregoing was filed with the office of the Clerk of Court, which will provide notice to all counsel of record using the CM/ECF system, and a true and correct copy of such filing was served via email on the following:

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